

National Organic Program – Access to Pasture (Livestock): Docket Comments

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Re: Comments on National Organic Program's Definition of Access to Pasture
(Livestock)
Docket ID: AMS-2006-0053-0001

It is a pleasure to have the opportunity to submit comments on the USDA's proposed rules for updating the National Organic Program regulations on access to pasture (livestock) with particular emphasis on dairy farming. The comment comes from personal views as a consumer of organic foods and also outlines concerns as expressed in print media.

The label 'USDA Organic' has a reputation to uphold. For the past 9 years, organic products have had greater than 20% growth annually.¹ As more and more consumers are choosing to purchase organic products than previously, they are also becoming a savvy group. The Organic Consumers Association, Cornucopia Institute, and Union of Concerned Scientists among others are educating consumers about dairy farming practices. They call for strict standards for milk products to be labeled organic by USDA. The term 'organic' placed on a food label should have the same meaning wherever or whenever it is purchased. Besides consistency, the standards for being certified organic by USDA should be straightforward so that a consumer can make an informed decision as to whether organic milk is preferred. It is important that the USDA's definition of organic comply with consumer expectation. Educated consumers can make a considerable impact on this growing sector of food industry.

It is my position that the definition of organic by USDA should more resemble the definition given by consumers.

Consumer Viewpoints

¹ "Consumer Demand Increasing for Local, Organic Foods" U.S. Fed News Service. Washington, DC March 14, 2006

The proposed rule states, "The OSP shall have the goal of providing grazed feed greater than 30% of the total dry matter intake on a daily basis during the growing season, but not less than 120 days." (pg 3, col.1) This description of an organic dairy cow may not reflect that of the consumer. The Consumer's Union fielded a survey in which the majority of consumers want the organic milk they buy to come from grazing cows. Sixty percent of adults said they would not pay the premium price for organic milk if they knew the cow was confined indoors.² In a similar survey, the Center for Food Safety found that "five out of ten of all organic milk purchasers would no longer do so if they knew that many organic cows were confined to fenced-in feedlots and did not graze on pasture for most of their lives."² According to this rule, a cow could spend only 1/3 of a year having grazed feed at all. Even during the growing season when cows eat grass, it is only required that the grazed feed is greater than 30% of the daily total. This is not what consumers expect from organic milk.

Benefits for Consumer and Cow

Grass-fed cows have some health benefits compared to grain-fed. Conjugated linoleic acid is a chemical linked to a decrease in cancer risk.³ When cows are raised on pasture alone, their milk contains 3-5 times more conjugated linoleic acid than animals fed conventionally.⁴ In addition, grass-fed dairy is a source of Omega-3 fatty acids which have been known to increase brain function.⁵

A new book by Michael Pollan, *The Omnivore's Dilemma*, investigates the role of corn (the primary grain fed to cows) in dairy and meat processing.⁶ His argument is that cows are not evolutionary adapted to eat a diet of corn. Their digestive system is adapted to eating grass. He explains that a corn fed cow forms a slime covering the rumen which prevents gas from escaping. The treatment is to put a hose down their esophagus to let gas escape. This happens to some, but not all of corn fed cows. A more common problem is liver disease. If the cow eats too much corn in a short period of time, the rumen can become inflamed and ulcerate. Bacteria are able to enter the bloodstream from the rumen to cause a liver abscess. Although now the farmer has to treat the sick cow with antibiotics, it is still more economical to treat disease than offer a grazed diet.

In organic farming, antibiotics are reserved for treatment and not prevention of disease. One of the reasons is because of the growing concern of antibiotic resistance. Taking another preventive measure would be to offer a diet based primarily on grass.

² "The Consumer's Guide to Environmental Labels" Consumer's Union. Accessed: May 7, 2006. <http://eco-labels.org/focus.cfm?FocusID=24>

³ Aro, A., S. Mannisto, I. Salminen, M. L. Ovaskainen, V. Kataja, and M. Uusitupa. "Inverse Association between Dietary and Serum Conjugated Linoleic Acid and Risk of Breast Cancer in Postmenopausal Women." *Nutr Cancer* 38, no. 2 (2000): 151-7.

⁴ Dhiman, T. R., G. R. Anand, et al. (1999). "Conjugated linoleic acid content of milk from cows fed different diets." *J Dairy Sci* 82(10): 2146-56

⁵ Simopolous, A. P. and Jo Robinson (1999). *The Omega Diet*. New York, HarperCollins.

⁶ Pollan, Michael. (2006). *The Omnivore's Dilemma*, Penguin USA.

Consumer Confidence is Important

Almost two-thirds of U.S. consumers bought an organic food or beverage last year.⁷ Organic foods contributed \$15 billion to the economy last year.⁸ Despite a higher price for milk, the consumer is willing to pay for organic. As consumers become more educated, they will want to know that the USDA standard for organic products is in sync with their views and the associations representing organic issues. I believe that a standard which reflects consumer choice is important to the organic food industry. However, the standards and consumer expectations are not aligned. The organic dairy industry is at risk because the standards allow for farmers to raise dairy cows primarily on corn. Imposing strict standards will be helpful in ensuring continued growth of the organic food industry.

I propose that the revised rule should read, “The OSP shall have the goal of providing grazed feed greater than 80% of the total dry matter intake on a daily basis during the growing season, but not less than 200 days.” Although I feel the organic standard for dairy cows should eventually be closer to 100% grass-fed for 365 days of the year (with few exceptions in cases of harsh weather), the standards should become incrementally stricter with every proposition of a new rule.

⁷ “When it pays to buy organic” Consumer Reports, Feb 2006 vol. 71, Iss., 2: pg.12.

⁸ Harlin, Kevin. “Market grows for organics” Knight Ridder Tribune Business News. Washington: April 18, 2006. pg.1.